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Comments: Draft SSFL DOE EIS Area IV

Thank you for the opportunity to comment on the Draft EIS. I am the co-chair of the SSFL Community Advisory Group and a member of the West Hills Neighborhood Council, however I am submitting my own comments for your consideration.

The EIS is a well-written document with cleanup analysis, alternates and consequences, and it allows the public to evaluate a technical and complicated subject.

The No Action alternate is not acceptable since it does not clean up the site which is owned by Boeing and is inconsistent with Boeing's intent to have their entire property used for open space. The end use of the property for open space is an important consideration for the public.

The AOC describes a flawed cleanup method that has a list of chemicals and radioactive nuclides to be removed to background or detect using point-to-point sampling without any consideration of toxicity or threats to human health. This method guarantees the removal of an extraordinary amount of soil and the cleanup values are to be used for the selection of backfill soil and are so exacting that no acceptable backfill has been found. The AOC cleanup method should not be considered.

The next alternate proposes revising the AOC to allow the use of risk-based levels for cleanup, and of the 132 chemicals listed only 32 are potential threat to human health, and the amount of soil to be removed is greatly reduced, but the point-to-point sampling is retained. Unnecessary excavation will be included and this method is not recommended for consideration.

I support the last alternate, Conservation of Natural Resources, which revises the AOC, and uses risk based screening levels and area averaging for the clean up of chemicals and nuclides. This alternate would use U.S. EPA guidelines, and would minimize excavation, air pollution and truck traffic. In situ remediation could be used and backfill soil would be available under the safe and realistic cleanup values.

The reduction of the excavation is important for the conservation of the environment, culture and wildlife habitat at the SSFL this further supports the selection of this alternate.

I recommend that the air monitoring be expanded for residents' safety and testing be done for diesel fume particles, Valley Fever and other health threats such that excavation and transport could be curtailed while mitigation takes place.

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